

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

DAWN COULTER and TRACY JOHNSON,
individually and on behalf of all others similarly
situated,

v.

VILLA HEALTHCARE MANAGEMENT, INC.,

Case No. 1:22-cv-01970
FLSA Collective Action
Fed. R. Civ. P. 23 Class Action

Judge Elaine E. Bucklo

Magistrate Judge Jeffrey Cummings

PLAINTIFFS' NOTICE OF FILING AMENDED NOTICE FORMS
IN RESPONSE TO COURT'S ORDER ON CONDITIONAL CERTIFICATION

Plaintiffs have amended their proposed notice forms in compliance with the Court's Order on FLSA conditional certification. ECF No. 82. As ordered by the Court, the notice forms have been revised to reflect references to "healthcare facilities affiliated with Villa." *See id.* at *5. Plaintiffs have updated all of the proposed notice documents (the notice, email, and text message) in accordance with the Court's ruling.

The Court ordered that the healthcare facilities should match the list of facilities in paragraph 30 of Plaintiffs' Second Amended Complaint. *Id.* at *5 n.1. In addition to the facilities identified in paragraph 30 of the Second Amended Complaint, however, Plaintiffs also identified during the course of discovery, three additional Villa facilities¹ which were included in Plaintiffs' Motion for Conditional Certification but were not listed in paragraph 30 of the Second Amended Complaint. ECF No. 70-1, at *13 n.1. Plaintiffs have included these facilities in the amended, proposed notice form.

¹ These are: Spring Meadows, a Villa Center; Villa at Palos Altos; and Villa at South Holland.

Copies of the amended proposed notices are attached for the Court's review and approval. In addition, for the ease of the Court, Plaintiffs have attached versions of the notices tracking the changes made.

Plaintiffs respectfully request the Court approve the amended notices.

Respectfully submitted,

/s/ Matthew S. Parmet

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